

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
MCALLEN DIVISION**

UNITED STATES OF AMERICA	§	
	§	
VS.	§	7:13-CR-70 (7:12-MJ-2646)
	§	
JONATHAN TREVINO	§	

MOTION TO DEPOSE MATERIAL WITNESS

COME NOW, JUAN VASQUEZ-VEGA, a material witness in the above referenced case, by and through his attorney of record, Edward P. Sanchez, files this his Motion to Depose Material Witness, pursuant to 18 USC 3144 and Rule 15 F.R.C.P. and for cause would show the Court as follows:

I.

On or about January 24, 2013, JUAN VASQUEZ-VEGA, was ordered to be held as a material witness in Magistrate No. **7:13-CR-70 (7:12-MJ-2646)**. JUAN VASQUEZ-VEGA, is held without bond and is currently detained.

II.

JUAN VASQUEZ-VEGA, invokes Federal Rule of Criminal Procedure Rule 15(a) and prays that a deposition of his testimony be taken as soon as is practical, and that upon such deposition being completed, they he be released and/or deported to Mexico, his country of origin.

III.

The material witness's testimony can be secured by deposition.

Movant states he is indigent and ask the Court that all costs herein be paid by the Government.

WHEREFORE, PREMISES CONSIDERED, movant prays this court to order deposition, that a time and place be designated in order that adequate notice be accomplished, and that all costs be taxed against the Government, and for such further relief that the court may deem appropriate.

Respectfully Submitted,

BARRERA & SANCHEZ & ASSOCIATES, P.C.
10113 N. 10th St., Suite A
McAllen, Texas 78504
(956) 287-7555
(956) 287-7711 (fax)

BY: _____/s/
Edward P. Sanchez
State Bar No. 00791598
Federal ID No. 2077

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been forwarded to Anibal Alanis, United States Attorney's Office at 1701 W. Business Highway 83, Suite 600, McAllen, Texas.

/s/
Edward P. Sanchez

CERTIFICATE OF SERVICE

I hereby certify that on January 31, 2012 I conferred with Anibal Alanis of the United States Attorney's Office and he is opposed to my Motion to Depose Material Witness.

/s/
Edward P. Sanchez

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JONATHAN TREVINO

§

ORDER

On the ____ day of _____, 2013 came on to be heard the Material Witness motion to have his depositions taken by the Government and the Defendant, having considered the same, this Court is of the opinion that it should be in all things _____.

Depositions will be taken as follows:

JUAN VASQUEZ-VEGA: _____

Done at McAllen, Texas, this ____ day of _____, 2013.

JUDGE PRESIDING